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REMARKS

Claims 1-7, 21, 25, 28-30, 32-40 and 44 are all of the claims presently pending in

the application. Claims 26, 27, 31, and 41-43 have been canceled without prejudice or

disclaimer. Claims 1, 21, 25, 28-30, 32, 37 and 38 have been amended to more

particularly define the claimed invention.

Entry of this Amendment is believed proper since no new issues are being

presented to the Examiner that would require further consideration and/or search.

Applicants specifically state that no amendments to any claim herein should be

construed as a disclaimer of any interest in or right to an equivalent of any element or

feature of the amended claim.

Claims 41-43 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to

comply with the written description requirement. Claim 41 stands rejected under 35

U.S.C. § 112, second paragraph, as being indefinite. Claims 1-7, 21, 25-32, and 37-44

stand rejected under 35 U.S.C. § 102(e) as being anticipated by Porter.

Theses rejections are respectfully traversed in the following discussion.

I.   THE CLAIMED INVENTION

The claimed invention (e.g., as exemplary defined by claim 1) provides a method

of linking domain knowledge to document knowledge including re-evaluating the object

model access expression of each of the document knowledge variables whenever the

domain model is reorganized (e.g., see Application at page 10, lines 6-15). The claimed

invention including this feature provides a dynamic document-to-domain linkage that

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allows different domain knowledge elements to be dynamically manipulated during the

interactive configuration of a document (see Application at page 5, lines 13-15). This

allows the user to edit text as the user would in a regular word processor while

maintaining constant and dynamic access to information provided by the document

system (see Application at page 6, lines 11-13).

II.   THE 35 U.S.C. § 112 REJECTIONS

The Examiner has rejected claims 41-43 under 35 U.S.C. § 112, first paragraph,

as allegedly failing to comply with the written description requirement. Additionally, the

Examiner has rejected claim 41 under 35 U.S.C. § 112, second paragraph, as allegedly

being indefinite.

While Applicants disagree with each of the Examiner's allegations, _merely in an_

effort to speed prosecution, Applicants have canceled claims 41-43, thus rendering the

Examiner 's rejections under 35 U.S.C. §112 moot.

Therefore, the Examiner is respectfully requested to reconsider and withdraw

these rejections.

III.   THE PRIOR ART REFERENCE

The Examiner alleges that Porter teaches the claimed invention of claims 1-7, 21,

25-32 and 37-44. Applicants, however, respectfully submit that Porter does not teach or

suggest each and every feature of the claimed invention.

That is, Porter does not teach or suggest _"re-evaluating the object model access_

expression of each of said document knowledge variables whenever the domain model is

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reorganized" (emphasis added by Applicants), as recited in claim 1, and similarly recited

in claims 21 and 25.

The Examiner alleges that Porter teaches this feature of the claimed invention.

The Examiner attempts to rely on column 17, lines 23-55 of Porter to support his

allegations. The Examiner, however, is clearly incorrect.

Indeed, nowhere in this passage (nor anywhere else for that matter) does Porter

teach or suggest re-evaluating the object model access expression of each of the

document knowledge variables whenever the domain model is reorganized. This passage

of Porter refers to changes made in the document objects, not changes (e.g.,

reorganization) in the domain model.

Specifically, Porter merely teaches changing the content or structure of

documents by making changes to document macros to accomodate changes in laws or

policies that affect the documents (see Porter at column lines 23-28). Porter does not

discuss changes the organziation of the domain model. In contrast, Porter merely

discusses the situation when changes need to be made to the stored document text.

Porter merely provides a method to create documents in response to data provided

by a user describing a transaction to be documented. The method of Porter is merely an

example of the conventional document assembly systems described in the Background of

the Application.

Indeed, Porter represents documents as a collection of paragraphs of text or

"document components". The document assembly system of Porter draws from a

respository (e.g., source code library) of document components. Given the answers to a

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series of questions input by user, the system selects components from the repository and sequences them to form a document (e.g., see Porter at column 7).

In the Porter system, domain knowledge (i.e., data input by user) is captured as answers to a collection of questions. These answers are used to select and assemble a series of document components from the source code library. The series of questions are not organized as a model and saved for later use after the document has been assembled.

In stark contrast, the claimed invention creates a domain model that stands independently from the document and can be freely used to build templates for other documents for separate transactions. Whenever a change occurs (e.g., such as reorganization) to the domain model, the link manager reevaluates the domain model reference expression to establish an appropriate link between the domain knowledge and the document knowledge.

This feature is not taught or suggested by Porter. Indeed, Porter does not provide for changes to be made to the domain model. That is, in Porter a user inputs data (e.g., domain data) directed to a particular transaction. The system uses the input data to generate all necessary documents for the particular transaction. Once the documents for that particular transaction are completed, the system no longer uses the domain data input by the user. Once a new transaction occurs, a complete new set of data is entered and the process restarts.

Indeed, as indicated above, while Porter may discuss updating the document macros when changes need to be made to the document form paragraphs, Porter does not address changes to or the reorganization of the domain model, as recited in the claimed invention.

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Therefore, Applicants submit that Porter fails to address each and every feature of

the claimed invention. Therefore, the Examiner is respectfully requested to reconsider

and withdraw this rejection.

IV. CONCLUSION

In view of the foregoing, Applicants submit that claims 1-7, 21, 25, 28-30, 32-40

and 44, all of the claims presently pending in the application, are patentably distinct over

the prior art of record and are in condition for allowance. The Examiner is respectfully

requested to pass the above application to issue at the earliest possible time.
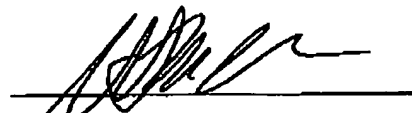
Should the Examiner find the application to be other than in condition for

allowance, the Examiner is requested to contact the undersigned at the local telephone

number listed below to discuss any other changes deemed necessary in a telephonic or

personal interview.

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The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: June 6, 2006

Scott M. Tulino, Esq.
Registration No. 48,317
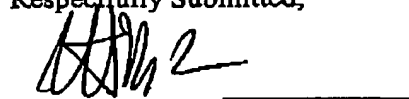
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FACSIMILE TRANSMISSION

I hereby certify that I am filing this paper via facsimile, to Group Art Unit 2176, at (571) 273-8300, on June 6, 2006.

Respectfully Submitted,

Date: June 6, 2006

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